

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

KITCHEN WINNERS NY INC.,

*Plaintiff,*

-against-

ROCK FINTEK LLC,

*Defendant.*

Civil Action No. 22-cv-05276-PAE

ROCK FINTEK LLC,

*Counterclaim and Third-  
Party Plaintiff,*

-against-

KITCHEN WINNERS NY INC.,

*Counterclaim Defendant,*

and

ADORAMA INC., HERSHEY WEINER,  
JOSEPH MENDLOWITZ, JNS CAPITAL  
HOLDINGS LLC and JOEL STERN

*Third-Party Defendants.*

**DECLARATION OF PHILLIP RAKHUNOV**

I, Phillip Rakhunov, declare and state as follows:


1. I am a partner at the law firm Pollack Solomon Duffy LLP and counsel of record for Defendant/Counterclaim and Third Party Plaintiff Rock Fintek LLC (“Rock Fintek”), in

reference to the above captioned matter. I submit this declaration pursuant to the Court's March 12, 2024 order regarding Rock Fintek's Motion to Seal Bank Records.

2. Attached as **Exhibit N** hereto is a redacted version of Exhibit N filed by the Adorama Parties on February 18, 2024.

3. Attached as **Exhibit O** hereto is a redacted version of Exhibit O filed by the Adorama Parties on February 18, 2024.

I DECLARE UNDER THE PAINS AND PENALTIES OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT. EXECUTED ON March 22, 2024:



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Phillip Rakhunov